

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

POLAROID CORPORATION	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 06-738 (SLR)
	)	
HEWLETT-PACKARD COMPANY,	)	
	)	
Defendant.	)	

**POLAROID’S MOTION TO PRECLUDE HEWLETT-PACKARD FROM RELYING ON  
UNTIMELY DISCLOSED OPINIONS, WITNESSES, AND DOCUMENTS**

Pursuant to Fed. R. Civ. P. 37, Plaintiff Polaroid Corporation (“Polaroid”) hereby moves the Court to exclude as untimely two categories of evidence recently and untimely produced by Hewlett-Packard Co. (“HP”): (a) the previously undisclosed expert opinions contained in a new declaration from HP’s expert Dr. Rangaraj Rangayyan; and (b) witnesses not previously disclosed, including Chris Hayes, Jim Ruder, and Paul Ruiz.

The grounds for this motion are set forth in Polaroid’s Opening Brief in Support of Its Motion to Preclude Hewlett-Packard from Relying on Untimely Disclosed Opinions, Witnesses, and Documents, filed herewith.

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June 25, 2008

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**RULE 7.1.1 CERTIFICATE**

Pursuant to D. Del. L.R. 7.1.1, this is to certify that counsel for Polaroid have discussed the subject matter of this motion with counsel for HP, and counsel for HP indicated that they will oppose the motion.

/s/ Julia Heaney  
Julia Heaney

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on June 25, 2008, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

William J. Marsden, Jr.  
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I also certify that copies were caused to be served on June 25, 2008 upon the following in the manner indicated:

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